

EXHIBIT C

INTERROGATORY NO. 9:

List each of the Defendants. Then, for each Defendant, describe in detail the actions that you contend give rise to liability for that particular Defendant in this case.

OBJECTIONS AND ANSWER:

Plaintiff restates and incorporates her general objections. Plaintiff also objects to this Interrogatory to the extent that it requests information subject to any privilege or restriction on the release of information, including the attorney-client privilege, spousal privilege, the attorney work product doctrine, and any other applicable privilege. Plaintiff further objects to this Interrogatory on the grounds that the Interrogatory is overly broad and unduly burdensome (*e.g.*, “[d]escribe in detail” all actions giving rise to liability), as set forth in General Objection 8.

Subject to the foregoing, and without waiving Plaintiff’s General and Specific Objections, Plaintiff answers Interrogatory No. 9 as follows:

The Defendants to this action are listed on the docket of this action, which Plaintiff hereby incorporates by reference. *See Strickland v. United States*, No. 20-cv-66; *see also* Status Conference Tr. 5–6, ECF No. 129 (July 14, 2022) (“Mr. Kolsky, if you really do want to challenge and get certain of the defendants or in particular capacities get them out of the case, I suggest now, in this procedural posture, answer and then move for judgment on the pleadings because under the mandate rule of course I’m going to fully comply with the mandate of the Fourth Circuit.”). The facts giving rise to liability for each Defendant are set forth in the Fourth Circuit’s opinion reversing the dismissal of her claims and allowing her due process and equal protection claims to proceed against the official capacity defendants. *See Strickland v. United States*, 32 F.4th 311 (4th Cir. 2022). Plaintiff is aware of the following documents and information that support the showing identified by the Fourth Circuit in its opinion: (1) Plaintiff’s verified complaint (ECF No. 1), (2) Plaintiff’s summary judgment motion and supporting

materials (ECF No. 60), (3) Defendants' summary judgment response and supporting materials (ECF No. 78), (4) Plaintiff's supplemental memorandum in support of summary judgment and supporting materials (ECF Nos. 116, 138), (5) Defendants' supplemental memorandum opposing summary judgment and supporting materials (ECF No. 135), (6) Plaintiff's preliminary injunction motion and supporting materials (ECF No. 125, 139), (7) Defendants' preliminary injunction response and supporting materials (ECF No. 134), (8) other filings in the docket, in both the district court and on appeal, containing evidence and sworn declarations regarding Defendants' violations of Plaintiff's constitutional rights (*see, e.g.*, ECF Nos. 6, 31, 55, 56, 57, 61, 76, 77, 94, 95, 97, 101, 122, 127, 170, No. 21-1346, Doc. 90-2 (Plaintiff's sworn declaration)), (9) the parties' discovery materials, including (a) Plaintiff's initial disclosures and ongoing document production, (b) Defendants' document production (*e.g.*, Def's Prod. US00000001–308), and (c) **documents that are exclusively in Defendants' possession as Plaintiff's former employer and EDR administrator that Defendants have not yet provided to Plaintiff, including (i) documents in the EDR Coordinator's possession about the Chapter X proceeding, including the EDR investigation report, (ii) documents from the EDR Chapter IX investigation, including disciplinary records, (iii) other EDR complaints during Mr. Martinez's tenure as federal defender, (iv) comments submitted regarding Mr. Martinez's reappointment as federal defender mentioning workplace harassment, retaliation, discrimination, and other abusive conduct as defined by the EDR Plan, (v) intercircuit assignment records for the district court proceeding and any other documents showing how and why Plaintiff's entire case was unlawfully sealed, and (vi) documents regarding benefits/compensation for attorneys employed by the FDO, and (10) Plaintiff's filings and documentation provided to Defendants during her EDR proceeding.**

INTERROGATORY NO. 10: